

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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**UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

**EQUITYBUILD, INC., EQUITYBUILD  
FINANCE, LLC, JEROME H. COHEN,  
and SHAUN D. COHEN,**

**Defendants.**

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**Civil Action No. 18-cv-5587**

**Hon. Manish S. Shah**

**Magistrate Judge Young B. Kim**

**NOTICE OF MOTION**

Please take notice that on Thursday, January 15, 2026 at 10:30 a.m., the undersigned will appear before the Honorable Manish S. Shah, or any judge sitting in his stead, in Courtroom 1919, and present Receiver's Motion to Approve Settlement of State Court Action.

Dated: January 5, 2026

Kevin B. Duff, Receiver

By: /s/ Michael Rachlis  
Michael Rachlis  
Rachlis Duff & Peel, LLC  
542 South Dearborn Street, Suite 900  
Chicago, IL 60605  
Phone (312) 733-3950  
Fax (312) 733-3952  
mrachlis@rdaplawnet

**CERTIFICATE OF SERVICE**

I hereby certify that on January 5, 2026, I electronically filed the foregoing **Notice of Motion and Receiver's Motion to Approve Settlement of State Court Action** with the Clerk of the United States District Court for the Northern District of Illinois, using the CM/ECF system. Copies of the foregoing were served upon counsel of record via the CM/ECF system and by electronic mail upon:

Michael S. Keating  
[mkeating@keatinglegal.com](mailto:mkeating@keatinglegal.com)  
Keating Law Offices  
20 South Clark Street, Suite 2301  
Chicago, IL 60603  
*Counsel for Estate of Valerie Pennington*

I further certify that I caused a true and correct copy of the foregoing to be served upon all claimants who have submitted claims in this matter by electronic mail.

I further certify that the **Motion** will be posted to the Receivership webpage at:  
<https://rdaplawnet/equitybuild-receivership/>

/s/ Michael Rachlis

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